

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

AFFIDAVIT OF JUAN LUIS VILLEGAS

vs.

BRIAN GARBE,

Case No. 19-cr-53

Defendant.

STATE OF WISCONSIN)
) SS.
COUNTY OF DANE)

JUANLUIS VILLEGAS, being first duly sworn, under oath states as follows:

1. Affiant is an employee of SIFT (Special Investigations & Forensic Technologies). SIFT is a digital forensic computer examining company. It operates from a full-time forensic laboratory in which its employees analyze electronic devices and software in civil and criminal matters.
2. Affiant was hired by the defendant to review the evidence in this case.
3. Affiant went to the office of Homeland Security on August 14-15, 2019, in Chicago to view evidence found on the defendant's computer.
4. Affiant was able to locate script No. P1010146A by file name, but was not able to see the image associated with that script.
5. Affiant was unable to locate the two other scripts that are listed in the search warrant, and defendant's counsel informed affiant that the Government could not locate those scripts either in any devices seized from the defendant.

6. Affiant believes that he needs to view Website M for the following:

A. Affiant has no idea of the design of the website or its contents.

B. The Affidavit used to obtain the search warrant indicates that by viewing a preview page, the viewer may then order the materials on the preview page. Affiant cannot determine the content of the preview page to determine whether the preview page allows one to determine exactly what he is ordering.

C. Affiant needs to verify that the scripts listed in the Affidavit used to obtain the search warrant actually contain the images/videos that the agent claims he saw when looking at that script, as two of them cannot be located on any of the defendant's electronic devices.

D. Affiant needs to verify whether there are other purpose for that website besides viewing child pornography.

E. Affiant needs to determine the percentage of images that are considered child pornography compared to the percentage of images that are not child pornography.

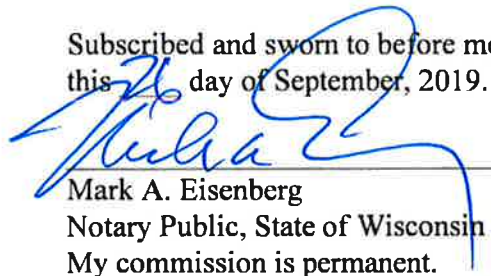
F. The file names are not always indicative of the content of the file. Affiant cannot determine what the defendant purchased simply by looking at the file name.

This Affidavit is given in support of the Second Motion for Additional Discovery.

Dated this 26 day of September, 2019.


Juan Luis Villegas

Subscribed and sworn to before me
this 26 day of September, 2019.


Mark A. Eisenberg
Notary Public, State of Wisconsin
My commission is permanent.

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Elizabeth Altman, Assistant United States Attorney

/s/ Mark A. Eisenberg

Mark A. Eisenberg